

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**TALISHA VALDEZ, on behalf of herself  
and others similarly situated, and  
JENNIFER BLACKFORD on behalf of herself  
And others similarly situated,**

**Plaintiffs,**

**Civil Action No.**

**v.**

**MICHELLE LUJAN GRISHAM,  
Officially and Individually, Acting Under the Color of Law,  
and  
DAVID SCRASE,  
Officially and Individually, Acting Under the Color of Law,**

**Defendants.**

**DECLARATION OF JENNIFER BLACKFORD**

I, Jennifer Blackford declare:

1. I am a resident of Rio Rancho, New Mexico.
2. I am a registered nurse employed by Presbyterian.
3. I have not been vaccinated for COVID-19.
4. The August 17, 2021, Public Health Order required that I be terminated if I refused to be vaccinated for COVID-19 or was not exempted without exemption.
5. I do not meet the criteria for either a medical exemption or a religious exemption, and I have been told I will not be allowed to continue in my employment without the vaccine.
6. I will be denied the right to engage in employment in my chosen profession by the PHO.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and is executed this 23rd day of August 2021, in Rio Rancho, New Mexico.

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Jennifer Blackford